

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

RICHARD E. KAPLAN,

*Plaintiff,*

V.

FIRST HARTFORD CORPORATION,

*Defendant.*

Civil Action No. 04-10402-NMG

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), the parties hereby jointly move the Court to enter the Stipulated Protective Order (the “Order”) that is attached at Exhibit “A.”

In support of this joint motion, the parties state that they have reached agreement on the terms of a protective order designed to expedite the flow of discovery material, facilitate the prompt resolution of disputes over confidentiality, adequately protect material entitled to be kept confidential, and ensure that protection is afforded only to material so entitled.

WHEREFORE, the parties jointly request that this Court approve and enter the attached Order.

RICHARD KAPLAN

By his attorneys,

/s/ Larry C. Kenna

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FIRST HARTFORD CORPORATION

By its attorneys,

/s/ Jonathan I. Handler

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-and-

John B. Nolan (admitted *pro hac vice*)  
DAY, BERRY & HOWARD LLP  
CityPlace I  
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August 16, 2004

CERTIFICATE OF SERVICE

I, Jonathan I. Handler, do hereby certify that on this 16th day of August 2004, I electronically filed the foregoing with the Clerk of Court using CM/ECF system, which will send notification of such filing to Larry Kenna, Choate, Hall & Stewart, Exchange Place, 53 State Street, Boston, MA 02109.

/s/ Jonathan I. Handler  
Jonathan I. Handler